

HAROLD P. SMITH, ESQ. (SBN: 126985)
psmith@dhillonsmith.com
KRISTA L. SHOQUIST, ESQ. (SBN: 264600)
kshoquist@dhillonsmith.com
PRIYA BRANDES, ESQ. (SBN: 286714)
pbrandes@dhillonsmith.com
DHILLON & SMITH LLP
177 Post Street, Suite 700
San Francisco, California 94108
Telephone: (415) 433-1700
Facsimile: (415) 520-6593

Attorneys for Plaintiff
Harmeet K. Dhillon

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

San Francisco Division

HARMEET K. DHILLON, an individual,

Case Number: C 13-1465 SI

Plaintiff,

V.

DOE 1, an unknown individual, and
DOES 2 through 10,

**DECLARATION OF AARON F.
PARK IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION FOR LEAVE TO TAKE
LIMITED DISCOVERY PRIOR TO A
RULE 26(f) CONFERENCE**

Defendants.

I, Aaron F. Park, declare:

1. I am a political blogger and conservative political activist in California. I have personal knowledge of the matters set forth herein and if called as a witness could

1 and would competently testify thereto. As to those matters stated on information and
2 belief, I believe them to be true.

3 2. In or around June 2012, after the primary election, I had a conversation
4 with Steve Frank, another political blogger, about writing a blog intended to serve as a
5 repository of information about Charles Munger Jr., a prominent Republican political
6 donor, and to comment upon Mr. Munger's political activities. During that
7 conversation, I told Mr. Frank that I would be interested in writing such a blog, to be
8 called "Munger Watch." Mr. Frank suggested that I approach Michael Schroeder to pay
9 for the costs of the Munger Watch blog, and provided me with Mr. Schroeder's phone
10 number. Mr. Schroeder is the former Chairman of the California Republican Party, and
11 his dislike for Mr. Munger's political activities is well known.

12 3. In or around June 2012, I spoke with Mr. Schroeder about the Munger
13 Watch blog, and he agreed to pay for the costs associated with setting up and
14 maintaining the website for the blog. During this conversation, Mr. Schroeder told me
15 that he had paid for and been very involved with a website called "Parsky Watch" at
16 parskywatch.com, which was posted from approximately 2002 to 2004. The Parsky
17 Watch website posted commentary upon the political activities of another wealthy
18 political activist and donor, Gerald L. Parsky, and was very similar in concept to the
19 Munger Watch blog. Those responsible for the Parsky Watch website routinely sent out
20 blast emails promoting the website. Upon information and belief, Parsky Watch
21 continued to be active until the time that Mr. Parsky discontinued active involvement in
22 California Republican Party affairs.

23 4. During this conversation, Mr. Schroeder told me that he had anonymously
24 written for Parsky Watch, and he encouraged me to write Munger Watch anonymously
25 as well. I do not engage in anonymous blogging, and declined to follow Mr. Schroeder's
26 suggestion.

1 5. In June 2012, I purchased several domain names with the intent of using
2 them for the Munger Watch blog, including mungerwatch.info, mungerwatch.com,
3 mungerwatch.co, mungerwatch.net, mungerwatch.org, mungerwatch.mobi,
4 mungerwatch.biz, and mungerwatch.us. Attached as Exhibit A is a true and correct
5 copy of my order confirmation from GoDaddy.com reflecting these purchases. I paid
6 for these domain names in the amount of \$66.00, and subsequently reimbursed myself
7 from the bank account of a partnership I co-owned at the time, Political Apocalypse
8 Partnership, by a check I wrote dated June 12, 2012, in the amount of \$66.00 for
9 "mungerwatch domains." Attached as Exhibit B is a true and correct copy of this check,
10 redacted to remove confidential account information.
11

12 6. In or around June 2012, I worked with NETitecture.com, a website
13 development firm with which I had worked in the past, to develop and set up the
14 Munger Watch blog at www.mungerwatch.com. I incurred \$450.00 in website
15 development, setup and hosting fees from NETitecture.com from June 2012 through
16 November 2012, as reflected in the invoice that is attached hereto as Exhibit C.

17 7. From approximately June 2012 to January 2013, I ran and wrote for the
18 Munger Watch blog at www.mungerwatch.com.

19 8. On multiple occasions in or around June and July 2012, I asked Mr.
20 Schroeder for reimbursement of the expenses I had incurred in connection with the
21 development, setup and hosting of the Munger Watch blog. After multiple requests,
22 Mr. Schroeder finally reimbursed me on July 10, 2012, by a check from his personal
23 bank account made out to Political Apocalypse Partnership in the amount of \$450.00.
24 Attached hereto as Exhibit D is a true and correct copy of this check, redacted to remove
25 confidential account information.
26

27 9. I cashed the check from Mr. Schroeder, deposited it into the bank account
28 for Political Apocalypse Partnership, and wrote a check dated September 12, 2012, from

1 that account to NETitecture.com in the same amount, \$450.00, in satisfaction of the
2 invoice for services performed on behalf of Munger Watch. Attached as Exhibit E is a
3 copy of that check, redacted to remove confidential account information.

4 10. In or around January 2013, I informed Mr. Schroeder that I was no longer
5 interested in running or being involved with the Munger Watch blog. I asked him
6 whether he would like to take over the blog, given that he had paid for its formation.
7 Mr. Schroeder replied that he would like to assume ownership of the blog. Mr.
8 Schroeder asked me to transfer to him all right and title in the mungerwatch domain
9 names, which I did. At the time, I spoke with Greg Simonic, Mr. Schroeder's web
10 technician, and gave him all the information in my possession regarding the
11 mungerwatch domain names, including informing Mr. Simonic that the domain names
12 would expire in June 2014, one year after they had been purchased.
13

14 11. Since January 2013, I have not had any involvement with the Munger
15 Watch blog or website, or with any of the mungerwatch domain names.

16 12. Upon information and belief, Mr. Schroeder and his agents have not
17 changed the registration information for all of the mungerwatch domain names to
18 reflect that these domain names have been transferred to Mr. Schroeder and Mr. Simonic.
19 Specifically, on February 15, 2013, I was informed by Harmeet Dhillon that according to
20 publicly available information she obtained on www.whois.com, a query and response
21 protocol, the domain name mungerwatch.org appeared to be registered to myself and
22 Greg Simonic. Upon information and belief, Ms. Dhillon asked me about the
23 mungerwatch domain names because an email address including the word
24 "Mungerwatch" had been used to send out email blasts from another website critical of
25 Mr. Munger and others. On the same day, I emailed Mr. Simonic and ask that he kindly
26 remove me from the registration information.
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1 13. Despite my request to Mr. Simonic, I am still inaccurately listed as a
2 registrant for mungerwatch.org, as reflected by information listed on Whois.com as of
3 the date of this declaration.

4 14. In early 2013, I became aware of a blog called "Munger Games" that is
5 hosted at www.Mungergames.net.

6 15. I am informed and believe that Munger Games is an extension and
7 continuation of the Munger Watch blog with which I was involved until January 2013.
8 This belief is based in part on emails that I have received on multiple occasions, from
9 the email address mungerwatch@gmail.com, providing information and updates about
10 the Munger Games blog and including links directly to the website at
11 www.mungergames.net.

12 16. My belief that Munger Games is an extension and continuation of the
13 Munger Watch blog is further based on some apparent overlap in the content of the two
14 blogs. Specifically, while in charge of Munger Watch, I wrote blog entries concerning
15 Charles Munger, Jr.'s donations to candidate Rocky Chavez, including Chavez's race
16 against Sherry Hodges in the general election. In these blog entries, I chronicled in
17 detail the amounts of money Mr. Munger spent on different occasions in connection
18 with Mr. Chavez. The Munger Games blog provides the identical, detailed information
19 regarding these contributions, in entries dated March 6, March 11 and March 19, 2013. I
20 am informed and believe that the work I did for the Munger Watch blog was used by
21 and directly incorporated into the Munger Games blog, without proper attribution.

22 17. Based on the information set forth above, which establishes the direct
23 connection between Mr. Schroeder and Munger Watch and strongly suggests that
24 Munger Games is a continuation of Munger Watch, I am informed and believe that
25 Michael Schroeder possesses information that will enable the Plaintiff in this lawsuit to
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1 ascertain the identity(ies) of the individual(s) who are responsible for posting content
2 on the Munger Games blog at www.mungergames.net.

3 I declare under penalty of perjury that the foregoing is true and correct under the
4 laws of the state of California, except for those matters stated on information and belief
5 and I believe those matters to be true.

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7 Date: August 22, 2013



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